

# GVNW

September 10, 1993

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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**SEP 10 1993**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 93-193

Dear Mr. Caton:

GVNW respectfully submits this letter in the above-referenced proceeding in order to rebut an unsupportable claim made by AT&T against the tariff filings of several Independent Telephone Companies (hereafter referred to as the "Independents") prepared by GVNW. (See Attachment A.) The claim was set forth by AT&T in its Opposition to the Direct Cases filed in this proceeding on August 24, 1993. GVNW notes that AT&T did not serve its Opposition on GVNW, its attorneys, or the Independents listed in Attachment A.

The AT&T Opposition asserts that the Independents have improperly failed to adjust their Traffic Sensitive (TS) rates to reflect changes in General Support Facilities (GSF) cost allocations adopted by the Commission in an Order issued on May 19, 1993. AT&T, however, has ignored the fact that the Independents filed their respective TS rates in accordance with Section 61.39 of the Commission's Rules.

Accordingly, the Independents rates are based on the historic period ending December 31, 1992. During this period, the GSF allocation rules adopted on May 19, 1993 were not in effect. Under Section 61.39, the Independents can not apply the cost allocation rules that were not in effect during the historic rate base period, regardless of whether the adjustment will yield higher or lower rates. The suggestion that these rates should be adjusted for prospective changes is contrary to the underlying policies that support the administrative efficiencies afforded by the Section 61.39 Rules.

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List A B C D E

GVNW INC./MANAGEMENT

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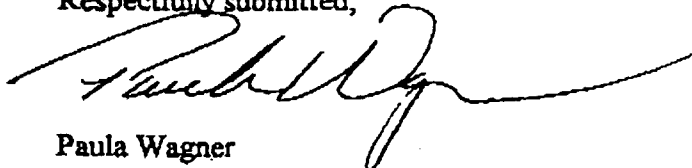
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The Commission should reject AT&T's attempt to overlook the Rules and its suggestion that the CCL revenue recovery of the Independents should be reduced to reflect the amount by which AT&T alleges the Independents should have reduced their TS rates. The Independents' CCL revenue recovery is based on a prospective rate base period, and should be developed in accordance with all applicable allocation Rules.

AT&T's proposal is based on the flawed concept that a match exists between the Independents' historic period based TS rates and their prospective period based CCL revenue recovery. The Commission should not adopt the AT&T proposal to adjust a prospective based CCL revenue requirement in order to artificially apply new allocation rules to the historic period on which the Independents' TS rates are based.

For these reasons, GVNW respectfully requests that the Commission reject the AT&T Opposition with regard to the Independents.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paula Wagner", with a long, sweeping horizontal line extending to the right.

Paula Wagner  
GVNW Inc./Management

C: AT&T  
National Exchange Carrier Association

ATTACHMENT A

**INDEPENDENT LECS MENTIONED IN AT&T'S PETITION  
of the  
DIRECT CASE FILINGS FOR GSF ADJUSTMENT**

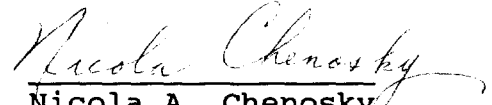
| <u>LEC</u>            | <u>STATE</u> |
|-----------------------|--------------|
| Ayrshire*             | IA           |
| Bloomingtondale       | IN           |
| Cass County*          | IL           |
| Chickamauga           | GA           |
| Citizens*             | MO           |
| City of Brookings     | SD           |
| Coastal Utilities     | GA           |
| Dubois*               | WY           |
| East Ascension*       | LA           |
| El Paso*              | IL           |
| Farmers Tel           | SC           |
| Gridley*              | IL           |
| Hargray               | SC           |
| Horry                 | SC           |
| Leaf River*           | IL           |
| Merchants and Farmers | IN           |
| Millington            | TN           |
| Mt. Horeb             | WI           |
| Northwest             | IA           |
| Northwest             | IN           |
| Odin                  | IL           |
| Pineland              | GA           |
| Sierra*               | CA           |
| Southeast             | WI           |
| Union**               | WY           |
| Webb-Dickens*         | IA           |

\* These companies are issuing carriers in the GVNW Inc./Management Tariff F.C.C. No 1 (Access Service)

\*\* Union Telephone Company Tariff F.C.C. No. 2 (Access Service) is filed and maintained by GVNW Inc./Management

**CERTIFICATE OF SERVICE**

I, Nicola A. Chenosky, do hereby certify that on this 10th day of September, 1993, a copy of the foregoing Rebuttal in CC Docket No. 93-193 was mailed by first class United States mail, postage prepaid, to the parties listed below.

  
Nicola A. Chenosky

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